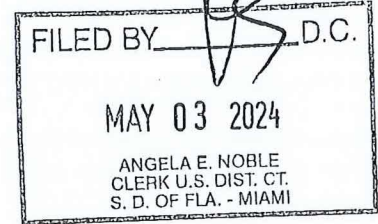


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. \_\_\_\_\_

IN THE MATTER OF  
THE EXTRADITION OF  
T.C.  
\_\_\_\_\_ /

**COMPLAINT**  
(18 U.S.C. § 3184)



I, the undersigned Assistant United States Attorney, being duly sworn, state on information and belief that the following is true and correct:

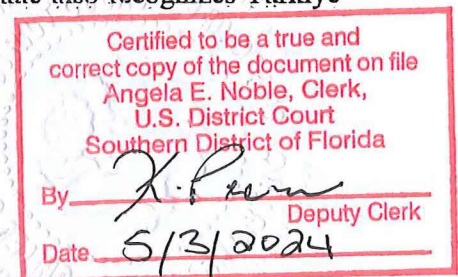
1. In this matter I represent the United States in fulfilling its treaty obligations to the Republic of Türkiye ("Türkiye").

2. There is an Extradition Treaty in force between the Government of the United States of America and the Government of Türkiye: Treaty on Extradition and Mutual Assistance in Criminal Matters Between the United States of America and the Republic of Turkey, U.S.-Turk., June 7, 1979, 32 U.S.T. 3111 (the "Treaty").<sup>1</sup>

3. Pursuant to the Treaty, the Government of Türkiye has submitted a formal request through diplomatic channels for the extradition of T.C., a minor who is currently age sixteen.

4. According to information provided by the Government of Türkiye, T.C. is wanted for prosecution on a charge of Causing Reckless Killing and Injury, in violation of and punishable by Articles 85/2 and 31/3 of the Criminal Code of Türkiye. This offense was committed within the jurisdiction of Türkiye.

<sup>1</sup> While this remains the title of the Treaty, the United Nations now recognizes Türkiye as the official spelling of the Requesting State. The U.S. Department of State also recognizes Türkiye as the proper spelling in its official correspondence.



5. At the request of the Chief Public Prosecutor's Office of Istanbul, a Chief Judge from the Istanbul 7th Criminal Judgeship of Peace issued a warrant for T.C.'s arrest on March 7, 2024. The extradition request presents the following facts as the basis for the arrest warrant and extradition request:

a. T.C. is accused of killing one person and injuring several others when he crashed his vehicle while driving at an excessively high rate of speed around a corner late at night on March 1, 2024. T.C. fled the scene before authorities arrived. Within hours of the crash, T.C. and his mother ("Mother"), had purchased airline tickets and fled Türkiye for the United States, via Cairo, Egypt.

b. On the night of March 1, 2024, T.C. was driving a Porsche with three passengers, one in the front, A.K., and two in the back, A.A. and B.A. T.C.'s friend, D.O.O., was driving another vehicle, also with passengers, directly behind T.C.'s vehicle.

c. Pursuant to Article 76 of the Regulation on Road Traffic, a person must be at least the age of eighteen to secure a driver's license in Türkiye. Accordingly, Turkish authorities confirmed that T.C. did not have a driver's license or otherwise have legal permission to drive at the time of the crash.

d. At around 11:20 p.m., T.C. and D.O.O. were driving on a road with a speed limit of 30 kilometers per hour (approximately 18 miles per hour). According to statements provided by T.C.'s passengers to Turkish authorities, T.C. suddenly began driving his vehicle faster after they passed a speed breaker on the road. The passengers requested that T.C. slow down, but he did not do so. In response, at least some of the passengers then put on their seat belts just "in case."

e. The vehicle approached a curve in the road, and according to T.C.'s



passengers, T.C. was driving too fast through the bend. As they were driving through the bend, T.C. and his passengers noticed something on the right side of the road. It was a group of people with all-terrain vehicles ("ATVs"). In response, T.C. suddenly turned the steering wheel in apparent effort to avoid hitting the group, but the car started to skid and hit the ATVs. T.C.'s car ended up on the opposite side of the road in a water channel, and the air bags deployed.

f. According to D.O.O., who was driving behind T.C. at the relevant time, T.C. had significantly increased his driving speed and entered a bend in the road too fast. D.O.O. lost sight of T.C.'s vehicle for several seconds as it went around the bend. When D.O.O. reached the bend, he saw T.C.'s vehicle lose control and crash into a water channel. D.O.O. immediately stopped his vehicle and noticed two men lying on the side of the road.

g. At the time of the crash, five individuals were stopped on the side of the road because one of their ATV vehicles had broken down. One of the individuals died from the impact with T.C.'s car; all the others were injured.

h. According to witnesses, T.C. and his friends had been driving around for some time before the crash. None of the passengers in T.C.'s or D.O.O.'s vehicles reported to authorities that T.C. had been intoxicated, although T.C. fled the scene before any tests could be performed. There also did not appear to be any indication that T.C.'s vehicle had malfunctioned.

i. According to a forensics report, authorities estimated that T.C.'s vehicle was traveling at approximately 170-180 kilometers per hour (approximately 105-111 miles per hour) at the time of the crash, which was significantly over the 30 kilometers per hour speed limit on the road.

j. A.K., the front seat passenger, identified T.C. to Turkish authorities as the driver of the Porsche that hit the five individuals stopped on the side of the road. Surveillance

footage from a gas station taken shortly before the crash also depicted T.C. as the driver of the Porsche that had crashed.

k. According to one of T.C.'s passengers, after the crash, they all got out of the vehicle and T.C. said something like "my life is over." Immediately after the accident, T.C. fled the scene without informing the law enforcement or health units that he was involved.

l. According to surveillance footage at the airport, T.C. and his Mother arrived at the Egyptair ticket sales office around 2:35 a.m. on March 2, 2024, only three hours after the crash. T.C.'s Mother purchased one-way tickets on a 3:50 a.m. flight from Istanbul, Türkiye, to Cairo, Egypt for herself and T.C. They continued on to the United States and landed in New York on March 2, 2024.

m. T.C. and his Mother were later observed in New York City, New York.

n. According to information provided from Turkish law enforcement to Interpol, T.C. and his Mother are now believed to be in Miami, Florida.

6. According to information gathered and provided by the U.S. Marshals Service, T.C. is expected to be found within the jurisdiction of this Court.

7. Tom Heinemann, an attorney in the Office of the Legal Adviser of the U.S. Department of State, has provided the U.S. Department of Justice with a declaration authenticating a copy of the diplomatic note by which the request for extradition was made and providing a copy of the Treaty. The declaration states that the offense for which extradition is sought is covered by the Treaty. It also confirms that the documents supporting the request for extradition bear the certificate or seal of the Ministry of Justice of Türkiye and, alternatively, are properly certified by the principal U.S. diplomatic or consular officer in Türkiye in accordance with Title 18, United States Code, Section 3190, so as to enable them to be received into

evidence.

8. Pursuant to Article 2 of the Treaty, a person who was sixteen years old at the time he committed the alleged criminal conduct may be extradited for the offense for which extradition is sought, a violation of Articles 85/2 and 31/3 of the Criminal Code of Türkiye. Pursuant to Article 4 of the Treaty, the United State is not bound to extradite its own nationals, but “the competent executive authority of the United States, however, shall have the power to grant the extradition of its own nationals, if, in its discretion, this is deemed proper to do.”

9. The declaration from the U.S. Department of State with its attachments, including a copy of the diplomatic note from Türkiye, a copy of the Treaty, and the certified documents submitted in support of the request, are filed with this complaint and incorporated by reference herein (marked collectively as Government’s Exhibit 1).<sup>2</sup>

10. T.C. would likely flee if he learned of the existence of a warrant for his arrest.

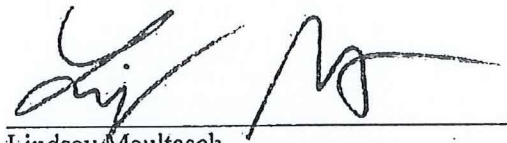
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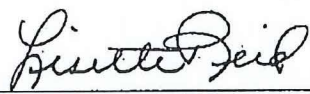
<sup>2</sup> The United States will file an unredacted copy of Government’s Exhibit 1 as a separate docket entry under seal. Once this complaint is unsealed, the United States will file a redacted copy of Government’s Exhibit 1.



WHEREFORE, the undersigned requests that a warrant for the arrest of the aforementioned person be issued in accordance with Title 18, United States Code, Section 3184 and the extradition treaty between the United States and Türkiye, so that the fugitive may be arrested and brought before this Court to the end that the evidence of criminality may be heard and considered, and that this complaint and the warrant be placed under the seal of the Court until such time as the warrant is executed.

  
Lindsey Maultasch  
Assistant United States Attorney

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1  
by Face Time this 2nd day of May 2024, at Miami, Florida.

  
HONORABLE LISETTE M. REID  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF FLORIDA